

Technical Exhibit 13-EMS - Appendix 8 - (Example) Form 16 - Environmental Nonconformities Tracking Log

Operations and Maintenance Contract: ECC – Kearneysville WV

Solicitation Number TIRNO-09-R-00018

DC Territory
ECC MARTINSBURG

5 Total Findings

Environmental Nonconformities Tracking

Total Closed

5

Finding #	OLD Finding #	E/H/S	Date Identified	Facility	Type Audit or Inspection	Auditor or Inspector	General Topic	ISO 14001, regulation, executive order, policy directive, etc.	Nonconformity	Recommendations	Person Assigned	Corrective Action Plan	Estimated Cost	Last Update	Date Closed	Closed by (Name)
01-DCT-09	01-MWV-09	E	7/21/2006	ECC	External	ECI & ICF	Air Pollution	45CSR7, 45CSR13	Facility operates 3 boilers and 15 generators under the premise that they are exempt from air permit requirements. However, under 45CSR7 and 45CSR13, the generators appear to be subject to general permit requirements. Obtain air permits, as required by State of West Virginia and EPA..		GSA	Contact WVDEP airpermits are needed. Contacted GSA requested assistance with obtaining air permits - GSA is currently working on a contract to provide the necessary data to apply for permit.. Contacted WVDEP paperwork provide to apply for determination of air permits. Air permits are ready to be sent to WVDEP - awaiting ad for paper to appear. Air Permits were submitted on September 26, 2008. Air Permits will be issued per WV DEP. We may be subjected to Title 5. Permits should received by March 15, 2009. Air permits received. We are subjected to title 5 and will apply.	\$2,400.00	2/20/2009	2/27/2008	Cathy Orr
03-DCT-09	03-MWV-09	E	7/21/2006	ECC	External	ECI & ICF	ODS	40CFR82	Facility maintains equipment with Class I and Class II refrigerants having a refrigerant charge of greater than 50 lbs. Documentation (recharge logs, leak repair, etc) was not available as required CFR 40 CFR 82. Refrigerant Management Plan was available but lacked site specific details and implementation procedures, as specified in IRS Statement of Work for Contract TIRNO-05-D-00001 and 40 CFR 82.	Revise Refrigerant Management Plan to contain all components specified in contract Statement of Work and 40 CFR 82. A consideration for any major equipment upgrades should include the phase out dates of refrigerants.	Frank Horan			4/3/2008	3/19/2008	Cathy Orr
05-DCT-09	05-MWV-09	E	7/21/2006	ECC	External	ECI & ICF	Hazardous Materials		Hazardous substances including gasoline, diesel fuel, antifreeze, paint, and waste oil were stored at many different locations. In several instances it was unclear who was responsible for containers and a small gasoline tank.	Procedures should to be established to better manage hazardous substances by employees and contractors. The areas for hazardous material storage should be designated and be easily identified. Prepare an inventory of equipment potentially containing hazardous chemicals.	Frank Horan; Anita Cooper	Each COTR will request their contractor inventory equipment containing hazardous chemicals(provide EMS coordinator with copies for files), designate and identify areas of hazardous material storage (provide verification to EMS coordinator once it is completed with list of areas & contents) - ownership of hazardous substances has been identified - inventories 70% completed - areas have been identified. Cafeteria, O&M contractor, SOG's, landscaping, snow removal, ce vendors, mail contractor, cleaning contractor have respond and complied. Still need EGG and FOH responses 95% completed. Received EG&G. All have been received.	\$0.00	7/15/2008	3/1/2009	Cathy Orr